

KENDRA M. MATTHEWS, OSB No. 965672

kendra@boisematthews.com

BRIDGET M. DONEGAN, OSB No. 103753

bridget@boisematthews.com

WHITNEY P. BOISE, OSB No. 851570

whitney@boisematthews.com

BOISE MATTHEWS DONEGAN LLP

Fox Tower

805 S.W. Broadway, Suite 1900

Portland, OR 97205

Telephone: (503) 228-0487

Fax: (503) 227-5984

Of Attorneys for Defendant Bethany Mockerman

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Eugene Division

UNITED STATES OF AMERICA,

Plaintiff,

v.

BETHANY MOCKERMAN,

Defendant.

Case No: **6:22-cr-00262-2-MC**

**DEFENDANT'S MOTION FOR
TEMPORARY RELEASE OF
PASSPORT**

Defendant, Bethany Mockerman, by and through her counsel, moves this Court for an order authorizing the United States Pretrial Services to temporarily release Ms. Mockerman's passport so that she may take a trip that will involve international travel, provided that before the passport is released, Ms. Mockerman must provide the full details of the trip (including the travel itinerary and accommodations information) to United States Pretrial Services.

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A family member (not co-defendant) has asked Ms. Mockerman to accompany her on a trip to visit another family member who is currently living abroad. Ms. Mockerman would not be paying for either the travel or accommodations on this trip. The defense has shared with the government and Mr. Cox with whom Ms. Mockerman hopes to travel, where they would be traveling and who she would be visiting. The travel arrangements, including the dates of travel, have not been made yet. If authorized, the trip would be completed before the trial date (June 6, 2023). If the Court authorizes the temporary release of Ms. Mockerman's passport to permit her to take this trip, Ms. Mockerman would make the travel arrangements, providing the details to Mr. Cox. She and Mr. Cox would then coordinate the timing of the release and return of the passport as necessary to accomplish the travel.

On February 2, 2023, United States Pretrial Services Officer Jeffrey Cox authorized counsel to report that his office has no objection to Ms. Mockerman being granted temporary custody of her passport so that she can go on this trip. Mr. Cox indicated that, provided the Court authorized the release of the passport for the express purpose of Ms. Mockerman going on this trip, he had no objection to coordinating the release/return of the passport directly with Ms. Mockerman upon her providing the full details of the travel, including airfare and accommodations information.

On February 7, 2023, Assistant United States Attorney Gavin W. Bruce authorized counsel to advise the Court that the government has no objection to Ms. Mockerman being granted temporary custody of her passport so that she can go on this trip.

This motion is accompanied by the declaration of Kendra M. Matthews.

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For the foregoing reasons, defendant asks that this Court grant this motion.

DATED this 7th day of February 2023.

Respectfully submitted,

BOISE MATTHEWS DONEGAN LLP

/s/ Kendra M. Matthews

KENDRA M. MATTHEWS, OSB No. 965672

(503) 228-0487

Of Attorneys for Defendant Bethany Mockerman

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DEFENDANT’S MOTION FOR TEMPORARY RELEASE OF PASSPORT on the following attorneys by causing it to be electronically filed on the 7th day of February, 2023.

Gavin W. Bruce
Assistant United States Attorney
United States Attorney’s Office
Suite 600
1000 S.W. Third Avenue
Portland, OR 97204-2902
Gavin.Bruce@usdoj.gov

BOISE MATTHEWS DONEGAN LLP

/s/ Kendra M. Matthews
KENDRA M. MATTHEWS, OSB No. 965672
(503) 228-0487
Of Attorneys for Defendant Bethany Mockerman